

Strategic Direction 1 planned action....

Reduce sewage related debris through a behavioural change campaign.

- Develop, launch and run an awareness raising campaign to promote behaviour change and highlight inappropriate flushing of wet wipes and sanitary items containing plastics down the toilet. The campaign will aim to significantly reduce the 36,000 sewer blockages that Scottish Water resolves per annum.

Question 1:

To what extent do you agree or disagree that the planned actions under each of the objectives will contribute to the achievement of Strategic Direction 1? - Reduce sewage related debris through a behavioural change campaign.

CTPA response - While there is no place for waste plastic in the environment, it must be acknowledged that many hygiene products, including wipes (irrespective of whether they contain plastic or not) are wrongly disposed of via the toilet. Therefore, CTPA believes that it is fundamental to inform consumers so that they are encouraged to dispose of wipes correctly. CTPA would suggest the requirement for clear on-pack labelling to advise whether products can be flushed or should be disposed of with household rubbish backed up by a solid, awareness campaign.

Public awareness, education and agreement is needed to help deliver the message on what is considered suitable, and acceptable, for flushing along with better control of pollution incidents and sewage overflow discharges from sewage treatment plants to prevent wipes that are not designed or marketed as flushable ending up in the environment.

CTPA would be happy to engage with the Scottish Government to raise consumer awareness on which wipes can and which wipes must not be flushed.

CTPA would also support its members in the need for harmonised requirements across the Devolved Nations, including Northern Ireland, for businesses to operate freely without excessive administrative burden and cost. This would also encourage widespread consumer understanding of the meaning of symbols or labels.

Strategic Direction 2 planned action....

The Scottish Government has: Supported Water UK in their work to develop and promote a 'Fine to Flush' standard across British waste water companies, and encourage wet wipe manufacturers to adopt these standards. The Fine to Flush certification prohibits the use of plastics in these products.

Reduce sources of sewage-related debris (SRD).

- Investigate the potential for legislation to ban the manufacture and sale of wet wipes containing plastic, with a requirement that any alternatives meet the 'Fine to Flush' standard.

Question 3:

To what extent do you agree or disagree that the planned actions under each of the objectives will contribute to the achievement of Strategic Direction 2? - Reduce sources of sewage related debris (SRD).

CTPA Response - There are different views held within CTPA membership.

CTPA believes that there is no place for plastic waste in the environment.

Whilst there are members of CTPA who are in support a ban of plastic in wipes, having invested in the development of alternative products or materials, some members have also suggested that the distinction should be between non-flushable and flushable wipes, not just those that contain plastic. A ban on wet wipes containing plastic would not necessarily solve the issue of wipes in the environment, be they from litter, wrongful disposal and subsequent escape from waste-water systems or landfill. However, it would reduce plastic pollution from wet wipes.

Some people with certain medical conditions rely heavily on wipes as they have an essential role in maintaining hygiene particularly where mobility is reduced or if the body's normal defense mechanisms are compromised. In such scenarios, wipes must be strong enough to last for their intended use without disintegrating. While in these circumstances plastic material might be required to maintain the integrity of the wipe during use, it is important to note that not all wipes contain plastic and so contribute to plastic waste. Manufacturers of wipes are innovating to develop alternatives to plastic content of wipes. As this waste should still be disposed of responsibly (whether in domestic or healthcare environments) the importance is that of messaging. It is important to encourage consumers to dispose of wet wipes correctly.

Robust scientific evidence including full life-cycle analysis would demonstrate whether the alternatives are indeed better for the environment and society.

CTPA is aware that the 'Fine-to Flush' specification is a water industry initiative. Whilst wipes can end up in waste-water systems, many of these wipes are not designed to be flushed down the toilet. CTPA members have advised that despite the adoption of the 'Fine-to-Flush' for flushable products, many wipes found in blockages are not designed to be, and are not marketed as, flushable.

CTPA would question whether a 'flushability standard' changes consumer behaviour regarding those wipes that are not designed to be flushed. It is confusing to consumers that some wipes are flushable. This confusion can be mitigated by clear, consistent messaging and awareness campaigns. Public awareness, education and agreement is needed to help deliver the message on what is considered suitable, and acceptable, for flushing along with better control of pollution incidents and sewage overflow discharges from sewage treatment plants to prevent wipes that are not designed or marketed as flushable ending up in the environment.

A specification for flushability, such as 'Fine-to-Flush' is only applicable for products that are specifically designed to be flushed, therefore requiring that alternatives to wipes containing plastic meet the 'Fine to Flush' specification is not possible, nor necessary. It is important to

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consider that a product's flushability is not the only way to reduce its impact on the environment.

CTPA would support its members in the need for any requirements to apply to all equivalent products being placed on the market, whether domestic or imported. Any new requirements must have sufficient time for implementation and products already placed on the market should not be required to be withdrawn as this adds extra costs to companies, already dealing with the new requirements of Brexit and the effects of COVID, as well having negative environmental impacts associated with unnecessary disposal/destruction.

Strategic Direction 5 planned action...

Build on and strengthen working relationships with wider UK.

- Work with UK Government and Devolved Administrations to share UK-wide approaches on shared issues where appropriate.

Question 9:

To what extent do you agree or disagree that the planned actions under each of the following objectives will contribute to the achievement of Strategic Direction 5?

CTPA Response - CTPA supports its members in the need for harmonised requirements across the Devolved Nations, including Northern Ireland, for businesses to operate freely without excessive administrative burden and cost. This would also encourage widespread understanding of the meaning of symbols or labels and better engagement with consumer awareness campaigns.

Question 12:

Do you think that any of the proposals / actions in this consultation have any financial, regulatory or resource implications for you and / or your business?

CTPA would support its members in the need for any requirements for wet wipes to apply to all equivalent products being placed on the market, whether domestic or imported. Any new requirements must have sufficient time for implementation and products already placed on the market should not be required to be withdrawn as this adds extra costs to companies, already dealing with the new requirements of Brexit and the effects of COVID, as well having negative environmental impacts associated with unnecessary disposal/destruction.

CTPA would also support its members in the need for harmonised requirements across the Devolved Nations, including Northern Ireland, for businesses to operate freely without excessive administrative burden and cost. This would also encourage widespread understanding of the meaning of symbols or labels and better engagement with consumer awareness campaigns.